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7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 v.

12 JOSE PORFIRIO ALVAREZ-AGUILAR,
aka "Jose Alvarez,"

13 Defendant.
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Case No. 2:21-mj-00562-NJK

**Stipulation for an Order
Directing Probation to Prepare
a Criminal History Report**

15 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
16 Chiou, Acting United States Attorney, and Jared L. Grimmer, Assistant United States
17 Attorney, counsel for the United States of America, and Raquel Lazo,
18 Assistant Federal Public Defender, counsel for Defendant JOSE PORFIRIO ALVAREZ-
19 AGUILAR, that the Court direct the U.S. Probation Office to prepare a report detailing the
20 defendant's criminal history.

21 This stipulation is entered into for the following reasons:

22 1. The United States Attorney's Office has developed an early disposition
23 program for immigration cases, authorized by the Attorney General pursuant to the
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1 PROTECT ACT of 2003, Pub. L. 108-21. Pursuant to this program, the government has
2 extended to the defendant a plea offer in which the parties would agree to jointly request an
3 expedited sentencing immediately after the defendant enters a guilty plea.

4 2. The U.S. Probation Office cannot begin obtaining the defendant's criminal
5 history until after the defendant enters his guilty plea unless the Court enters an order
6 directing the U.S. Probation Office to do so. Such an order is often entered in the minutes of
7 a defendant's initial appearance when charged by indictment.


8 3. The U.S. Probation Office informs the government that it would like to begin
9 obtaining the criminal history of defendants eligible for the early disposition program as
10 soon as possible after their initial appearance so that the Probation Office can complete the
11 Presentence Investigation Report by the time of the expected expedited sentencing.

12 4. Accordingly, the parties request that the Court enter an order directing the
13 U.S. Probation Office to prepare a report detailing the defendant's criminal history.

14 DATED this 2nd day of July, 2021.

15 Respectfully submitted,

16 CHRISTOPHER CHIOU
17 Acting United States Attorney

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19 Assistant Federal Public Defender
20 Counsel for Defendant JOSE
PORFIRIO ALVAREZ-AGUILAR

21 /s/ Jared L. Grimmer
22 JARED L. GRIMMER
23 Assistant United States Attorney
24

1 **UNITED STATES DISTRICT COURT**
2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JOSE PORFIRIO ALVAREZ-AGUILAR,
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Case No. 2:21-mj-00562-NJK

**Order Directing Probation to Prepare
a Criminal History Report**

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10 Based on the stipulation of counsel, good cause appearing, and the best interest of
11 justice being served:

12 IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a
13 report detailing the defendant's criminal history.

14 DATED this 12th day of July, 2021.

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17 HONORABLE NANCY J. KOPPE
 UNITED STATES MAGISTRATE JUDGE
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